

April 25, 2017 Draft

MEMORANDUM

SUBJECT: Office of Inspector General Hotline Complaint 2017-0182

FROM: Francesca Grifo
EPA Scientific Integrity Official

TO: Arthur Elkins
EPA Inspector General

You recently referred OIG General Hotline Complaint 2017-0182, an allegation of a violation of the EPA Scientific Integrity Policy by the Administrator, to me¹. I in turn have conducted an inquiry in accordance with our policy for resolving allegations of loss of scientific integrity² and our Coordination Procedures between the Scientific Integrity Official and the Office of the Inspector General³. In this process, we reviewed the Administrator's comments and the subsequent allegation in the context of the portions of the EPA Scientific Integrity Policy under my office's purview. We focused our review on the following text included in the EPA Scientific Integrity Policy⁴:

When an Agency employee substantively engaged in the science informing an Agency policy decision disagrees with the scientific data, scientific interpretations, or scientific conclusions that will be relied upon for said Agency decision, the employee is encouraged to express that opinion...

The Scientific Integrity Policy applies to all EPA employees, contractors, grantees, collaborators and student volunteers, including political appointees. The freedom to express one's scientific opinion is fundamental to EPA's Scientific Integrity Policy even (and especially) when that point of view might be controversial.

In this case, the Administrator was asked during a television interview, "Do you believe...." In response, the Administrator expressed his scientific opinion regarding contributors to global warming and called for more debate, review, and analysis. As an opinion, the Administrator's response does not violate the Agency's Scientific Integrity Policy. The Administrator's response was not associated with a policy decision, and the expression of his scientific opinion did not suppress or alter Agency scientific findings.

Expressing an opinion about science is not a violation of the EPA Scientific Integrity Policy. Indeed, the Scientific Integrity Policy – in the spirit of promoting vigorous debate and inquiry -- specifically encourages employees to express disagreement with scientific data, scientific interpretations, or scientific conclusions.

Thank you for your referral of this matter. I hope this information is useful as you move to conclude this matter.

cc: Members of the Scientific Integrity Committee
Robert Kavlock, EPA Science Advisor

¹ <https://www.docdroid.net/HvDdJZs/sierra-club-scientific-integrity-complaint-3-14-17.pdf.html> (last visited 4/4/17)

² https://www.epa.gov/sites/production/files/2015-04/documents/annual_report_scientific_integrity_2014_final_pages.pdf (last visited 4/4/17)

³ https://intranet.ord.epa.gov/sites/default/files/media/oig-scio_coordination_procedures_final.pdf (last visited 4/4/17)

⁴ https://www.epa.gov/sites/production/files/2014-02/documents/scientific_integrity_policy_2012.pdf (last visited 4/4/17)